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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

IN RE:	:	CASE NO. 23-11823-CMG
	:	
	:	CHAPTER 13
JAMES F. PAGUILIGAN,	:	
	:	HEARING DATE 10/18/2023
Debtor.	:	

**NOTICE OF MOTION TO REINSTATE
AUTOMATIC STAY**

TO: Charles Wohlrab, Esq.
Friedman Vartolo, LP
1325 Franklin Avenue
Suite 160
Garden City, New York 11530

Albert Russo, Esq.
CN4853
Trenton, NJ 08650
Chapter 13 Trustee

U.S. Trustee, US Dept, of Justice
Office of the US Trustee
One Newark Center, Suite 2100
Newark, NJ 07102

Fay Servicing, LLC.
as servicing for
U.S. Bank Trust National Assoc.
not as its individually capacity,
But solely as Trustee of LSF9
Master Participation Plan
P.O. Box 814609
Dallas, TX 75381-4609

PLEASE TAKE NOTICE that on October 18, 2023 at 9:00 A.M. or as soon as
counsel may be heard, the undersigned attorney for Debtor, James F. Paguiligan, will move
before the United States Bankruptcy Court, Trenton, NJ for an Order to reinstate the

automatic stay, with respect to real property located at 230 Lakewood Avenue, Bayville, New Jersey 08721.

PLEASE TAKE FURTHER NOTICE that in support of the within Motion, the Movant will rely upon the Certification in support and the proposed Order submitted herewith, as well as oral argument, if necessary. Pursuant to D.N.J. LBR 9013-12, Movant states that no brief or memorandum of law is necessary because of the absence of novel or complex questions of law. However, if responsive papers are filed in opposition to the Motion, the Movant reserves the right to respond to any issues of law raised therein in the form of a brief or memorandum of law.

If you do not want the Court to grant Movant relief from the relief requested, or if you want the Court to consider your views on the motion, then on or before eight days prior to the hearing date, you or your attorney must:

File with the Court a written response to Movant's motion explaining your position. Your response must be filed with the Bankruptcy Clerk at the United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey 08608.

If you mail your responses to the Court for filing, you must mail it early enough so the Court will **receive it** on or before the date stated above:

You must also mail a copy to:

David A. Semanchik, Esq.
248R Washington Street
Toms River, NJ 08753
Attorney for Movant

If you are opposing the Order Movant is seeking from the Court, you must attend the hearing scheduled to be held on October 18, 2023 @ 9:00 a.m., United States Bankruptcy

Court, 402 East State Street, Trenton, New Jersey 08608, the Honorable Christine M. Gravelle presiding.

The moving party herein does not request oral argument.

DATED: 10/5/2023

/s/David A. Semanchik
DAVID A. SEMANCHIK, ESQ.
Attorney for Debtor, James F. Paguiligan